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**PERSONAL DATA
PROTECTION ACT
("PDPA") POLICY**

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INTRODUCTION

Unitrade Industries Berhad (“UIB” or the “Group”) and its subsidiaries (collectively referred to as the “Group”) upholds the highest standards of professional integrity and ethical conduct required of every UIB director, officer, employee and third parties who perform services for or on behalf of the Group. UIB and all the employees are committed to compliance with the **Personal Data Protection Act 2010 (“PDP Act” or “the Act”)**, subsequent amendments to the PDP Act and all guidelines issued by relevant authorities pertaining to the same.

The PDP Act, which regulates the processing of personal data in commercial transactions, applies to Unitrade Industries Berhad (hereinafter referred to as “our”, “us” or “we”) as a data user. For the purpose of this Policy, terms used herein shall have the meanings ascribed to them in the Act.

POLICY STATEMENT

1. This Policy serves to inform you that we may process your personal data.
2. The personal data in relation to you may include information on your name, address, contact details, resume, details of birth, education background, employment history, referees and results of employment checks (including background, credit and references checks), copies and other details of identification documents, marital status, racial or ethnic origin, physical or mental health or medical condition(s), commission or alleged commission of any offence or proceedings for any offence committed or alleged to have been committed including past misconduct, the disposal of such proceedings or the sentence of any court in such proceedings and information captured on security systems (including voice, video, Close Circuit Television (CCTV) and security recordings). You may also be required to provide us with your personal financial and social security details, your emergency contact details and details of directorship or shareholding (if any).
3. We may process your personal data, including any additional information you may subsequently provide to us for the purposes of the contract of service or contract for service or such other contract as may have been entered into between you and us or for the purpose of your employment.

POLICY STATEMENT (con't)

4. In addition to the above, the personal data and the other information collected from you, including any information that you subsequently provide may be used and processed by us for the following reasons:-

- 4.1. processing employment applications including pre-employment checks;
- 4.2. determining and reviewing salaries, incentives, bonuses and other benefits;
- 4.3. consideration for promotion, career development, training, secondment or transfer, performance monitoring, health and safety administration and security and access control;
- 4.4. monitoring compliance with our internal rules and policies and adherence to our Business Conduct Guidelines;
- 4.5. complying with the compliance and disclosure requirements of any and all governmental and/or quasi governmental departments and/or agencies, regulatory and/or statutory bodies (e.g. Inland Revenue Board, the Employees' Provident Fund Board, the Social Security Organisation and Bank Negara Malaysia);
- 4.6. to enforce our rights under employment law or any other applicable laws to defend our rights under the law including but not limited to any disciplinary action or actions relating to the termination of employment; and purposes relating thereto.

5. Employees ought to be aware that failure to supply such data will affect our ability to perform our obligations under any potential or existing employment contract and/or your ability to enjoy the benefits of your employment with us.

6. Data held by us relating to employees and potential employees will be kept confidential but we may provide such information to the following parties, whether within or outside Malaysia, for the purposes as set out in paragraph 4 above (which parties may also subsequently process, transfer and disclose such data for the purposes set out in paragraph 4):-

6.1. any agent, contractor, service provider, any professional adviser or third party who provides administrative, telecommunications, human resources management or administrative services (including but not limited to performance of pre-employment or background checks, payroll administration, safety and provision or administration of benefits entitled to by employees) or any other service to the Group.

6.2. any other person under a duty of confidentiality to the Group which has undertaken to keep such information confidential;

POLICY STATEMENT (con't)

- 6.3. persons seeking employee references in respect of employees;
 - 6.4. any person to whom the Group is under an obligation to make disclosure under the requirements of any law binding on the company or under and the purposes of any guidelines or regulations issued by regulatory or other authorities with which the company is expected to comply;
 - 6.5. any court and/or officer of the court;
 - 6.6. any healthcare professional or hospital;
 - 6.7. our auditors;
 - 6.8. our lawyers and compliance professionals;
 - 6.9. our banks; and
 - 6.10. our service providers and vendors.
7. You may access and request for correction of your personal data and/or to limit the processing of your personal data, or make any enquiries or complaints in respect of your personal data, by contacting the HR department.
8. Pursuant to the Act, we may refuse to comply with your request for access or correction to your personal data and if we refuse to comply with such request, we will inform you of our refusal and the reason for our refusal.
9. We reserve the right to amend this Policy at any time and will ensure that a notice of such amendments will be made available to you through any mode we view appropriate and suitable.
10. You are responsible for ensuring that the personal data you provide us is accurate, complete and not misleading and that such personal data is kept up to date.
11. If you give us personal data or information about another person, you must first confirm that he/she has appointed you to act for him/her, to consent to the processing of his/her personal data and to receive on his/her behalf any data protection notices.
12. Any personal data supplied by you will be retained by the Group as long as necessary for the fulfilment of the purposes set out in this Policy or as is required to satisfy any legal, regulatory and/or accounting requirements.

POLICY STATEMENT (con't)

13. Your continued employment with us is deemed consent for us to collect, process, and store the data in accordance with the above. Failure to consent to the above may result in our inability to perform our obligations under any potential or existing employment contract or your ability to enjoy the benefits of your employment with us.

APPLICATION FOR NEW CUSTOMER ACCOUNT WITH US:

14. In relation to Credit Application to open new customer accounts with us, we also require you to indicate whether you agree to:-

- TO ALLOW AND CONSENT OUR COMPANY TO CONDUCT AND/OR DISCLOSE TRADE SEARCHES ON YOUR COMPANY(IES) AT ANY TIME FOR AS LONG AS WE HAVE A TRADE RELATIONSHIP WITH YOU PURSUANT TO PDP ACT 2010 & CRA ACT 2010.**
- TO ALLOW AND CONSENT OUR COMPANY TO CONDUCT AND/OR DISCLOSE TRADE SEARCHES ON YOUR DIRECTOR(S) AND/OR GUARANTOR (S) AT ANY TIME FOR AS LONG AS WE HAVE A TRADE RELATIONSHIP WITH YOU PURSUANT TO PDP ACT 2010 & CRA ACT 2010.**

MONITORING AND REVIEW

1. This Policy shall be revised as and when the need arises for any amendment or update.
2. Amendments to this Policy must be approved by the MD/CFO/COO.

COMMUNICATION AND PUBLICATION OF THIS POLICY

1. This Policy is made accessible to all employees, directors, associated personnel, and stakeholders on the Group's website at www.unitrade.com.my and they shall acknowledge that they have read, understood and agreed to comply with the PDPA Policy of Unitrade Industries Berhad. Any amendments to this Policy shall be communicated to them accordingly.